

**Before the**  
**FEDERAL COMMUNICATIONS COMMISSION**  
**Washington, DC 20054**

In the Matter of )  
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SPECTRUM NEEDS OF EMERGENCY   ) WT Docket No. 05-157  
RESPONSE PROVIDERS               )  
                            )

To: The Commission

**COMMENTS OF THE**  
**COUNTY OF LOS ANGELES, INTERNAL SERVICES DEPARTMENT**  
**AND**  
**LOS ANGELES COUNTY SHERIFF'S DEPARTMENT**

The County of Los Angeles, Internal Services Department and the Los Angeles County Sheriff's Department (the "County") hereby submit the following comments in response to the Commission's *Public Notice*, FCC 05-80, released March 29, 2005, in which the Commission seeks input for a report mandated by Section 7502 of the Intelligence Reform and Terrorism Prevention Act of 2004.

Los Angeles County has a population of over ten million persons, making it the most populous county in the nation, with a population greater than all but eight states. The County covers an area of 4,084 square miles of extremely varied terrain. The County includes the densely populated Los Angeles Basin bordering the Pacific Ocean, as well as high mountain ridges, isolated valleys, Catalina Island, and remote areas that are difficult to cover with emergency radio communications. There are 88 cities within the County, each with its own city council. All of the cities, in varying degrees, contract with the County to provide municipal services. Thirty-seven contract for nearly all of their municipal services.

The Los Angeles County Sheriff's Department is the largest sheriff's department in the world, and one of the largest law enforcement agencies in the United States, with over 12,000 personnel. The Department is a member of the Spectrum Coalition for Public Safety, and supports its separate comments in this proceeding.

The County relies upon extensive, highly reliable public safety radio communications networks for its law enforcement, fire, EMS, and other essential services, both for day-to-day emergencies and to provide "first response" to major events such as earthquakes, wildfires, civil disturbances, and threats to homeland security. These networks operate primarily in portions of the 470-512 MHz and 800 MHz bands and are currently at or well beyond capacity. The County also maintains extensive fixed microwave networks to connect remote transmitter sites and command centers throughout the County.

The FCC has long recognized that the Los Angeles area poses unique challenges for public safety communications due to its population density, size, geographic characteristics, and susceptibility to natural disasters such as earthquakes and wildfires.<sup>1</sup>

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<sup>1</sup> See, e.g., *Amendment of Parts 2, 73, and 90 of the Commission's Rules and Regulations to Allocate Additional Channels in the Band 470 - 512 MHz for Public Safety and Other Land Mobile Services*, 59 RR 2d 910 (January 22, 1986), in which the Commission reallocated TV channel 16 for public safety use in Los Angeles County:

The geographic area is expansive, with Los Angeles County covering an area of approximately 4000 square miles. The topography is diverse, ranging from seashore to valleys, to deserts, to 11,000-foot mountain peaks. Because of the climate and geologic conditions, the region is prone to natural disasters such as forest wildfires, floods, mudslides, earthquakes, high winds, high waves and tornados. The County has the highest concentration of automobiles in the world along with a vast network of freeways (totalling more than 500 miles). As a major manufacturing center, the Los Angeles area has experienced industrial disasters, including fires and hazardous chemical spills. These factors, among others, place severe demands on agencies involved with public safety in and around Los Angeles County. Moreover, these factors coupled with the general spectrum congestion present in the Los Angeles basin, place heightened demands on public safety communications systems.

Twenty years ago, the Commission responded by reallocating 6 MHz of additional spectrum for public safety use in the Los Angeles area, a portion of which was assigned to the County.<sup>2</sup> Since, then, the County’s communications needs have risen dramatically, while its available spectrum resources have remained largely unchanged. The County must also now focus substantial time and resources on preventing, and preparing to respond, to terrorist attacks and other threats to homeland security. Critical to that task, and to its day-to-day public safety operations, are effective, reliable, and fully interoperable communications systems.

The County needs additional radio spectrum to relieve congestion on existing systems and to address a pressing need for a new county-wide, broadband mobile communications system. Emergency personnel spread across the County need the ability to transmit and receive high speed data and full-motion video to and from vehicles, emergency scenes, and command centers. Such a network would be especially important for “command and control” of emergency situations throughout the County’s extensive (and disaster prone) geography.

At the present time, the County does not have access to any spectrum to meet this broadband communications requirement. While an additional 24 MHz has been reallocated for public safety use across the nation, that spectrum cannot be used in Los Angeles (or most other major metropolitan areas) pending completion of the digital television transition. Moreover, the 24 MHz has been allotted for narrowband voice and “wideband” (150 kHz channel) data. It will not address the need for high-speed

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<sup>2</sup> *Id.*

broadband mobile communications. The FCC recently reallocated 50 MHz of spectrum in the 4.9 GHz band for public safety use. While that spectrum will accommodate broadband applications, its propagation characteristics are such that it can only be used for short-range data transmissions, such as on-scene incident management. The 4.9 GHz band is not appropriate for wide-area mobile broadband communication, especially in a jurisdiction as large and varied as Los Angeles County.

Therefore, the County urges the Commission to include in its congressionally mandated study of public safety spectrum needs a finding that additional radio spectrum is required for broadband communications.

Respectfully submitted,

COUNTY OF LOS ANGELES,  
INTERNAL SERVICES DEPARTMENT  
and  
LOS ANGELES COUNTY SHERIFF'S  
DEPARTMENT

By: /s/

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